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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

ALICIA HERNANDEZ, *et al.*, individually  
and on behalf of all others similarly situated,

Plaintiffs,

v.

WELLS FARGO BANK, N.A.,

Defendant.

No. 3:18-cv-07354 WHA

**STIPULATED ADMINISTRATIVE MOTION  
FOR ENTRY OF AN AMENDED  
PROTECTIVE ORDER PURSUANT TO L.R.  
7-11 AND 7-12**

**STIPULATED ADMINISTRATIVE MOTION FOR ENTRY OF  
AN AMENDED PROTECTIVE ORDER PURSUANT TO L.R. 7-11 AND 7-12**

Defendant Wells Fargo Bank, N.A. (“Wells Fargo”) respectfully requests, with Plaintiffs’ consent, that the Court enter an Amended Stipulated Protective Order (“Amended Protective Order”) in the form attached as Exhibit 1 hereto. The Court previously entered a Stipulated Protective Order in this matter. (Dkt. Nos. 66 and 69.) The only difference between that order and the proposed Amended Protective Order is that the latter allows the parties to use an “Attorney’s Eyes Only” designation for documents that contain personal identifying information of unnamed class members (now that the Court has certified a class), limiting the disclosure of unnamed class members’ personal identifying information to only the parties’ outside counsel and their experts in this litigation. The Amended Protective Order is necessary to facilitate the exchange of the unnamed class members’ loan files before trial begins on May 11, 2020. A redlined document showing the differences between the two orders is attached as Exhibit 2.

The parties respectfully request that the Court enter the proposed Amended Protective Order.

Dated: March 5, 2020

WINSTON & STRAWN LLP

By: /s/ Amanda L. Groves

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